

AO 91 (Rev. 11/11) Criminal Complaint

Agent:

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Brett A. Laug

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UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.  
Monica Liliana Gonzalez-Buenahora

Case: 2:25-mj-30110  
Assigned To : Unassigned  
Case No. Assign.Date : 3/4/2025  
Description: CMP USA v.  
GONZALEZ-BUENAHORA (DJ)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 26, 2025 in the county of Wayne in the  
Eastern District District of Michigan, the defendant(s) violated:

*Code Section*  
8 U.S.C. 1253(a)(1)  
18 U.S.C. 1028A

*Offense Description*  
Penalties Related To Removal  
Aggravated Identity Theft

This criminal complaint is based on these facts:  
See Attached Affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: March 4, 2025

City and state: Detroit, Michigan

  
Complainant's signature

Brett Laug, BPA

Printed name and title

  
Judge's signature

Hon. Kimberly G. Altman United States Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Brett A. Laug, declare the following under penalty of perjury:

1. I am a Border Patrol Agent with the United States Department of Homeland Security, United States Border Patrol. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers to include Border Patrol Agents and records checks of law enforcement databases. I have also reviewed the immigration file and system automated data relating to Monica Liliana GONZALEZ-BUENAHORA. This affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint and arrest warrant for Monica Liliana GONZALEZ-BUENAHORA, for a violation of 8 U.S.C § 1253(a)(1) Penalties Related to Removal, and 18 U.S. Code § 1028A - Aggravated identity theft. I have not included every fact known to law enforcement related to this investigation.
2. On February 26, 2025, Trenton Police Department contacted the Gibraltar Border Patrol Station for help identifying GONZALEZ-BUENAHORA, who was the co-occupant of a vehicle stopped for an Equipment Violation in Trenton, Michigan. GONZALEZ-BUENAHORA had in her possession a United States Permanent Resident Card and a Social Security card, which were subsequently determined to be fraudulent.

3. After confirming her illegal status in the United States, GONZALEZ-BUENAHORA was surrendered to the Border Patrol Agents, who transported her to the Gibraltar Border Patrol Station for further processing.
4. While at the Gibraltar Border Patrol Station, GONZALEZ-BUENAHORA's fingerprints and photograph were captured and entered into the Automated Biometric Identification System (IDENT) and the Next Generation Identification (NGI). The results revealed that GONZALEZ-BUENAHORA is a citizen of Columbia, who entered the United States illegally however was provided an Immigration court hearing date.
5. When questioned about the fraudulent documents that were in GONZALEZ-BUENAHORA's possession at the time of her arrest GONZALEZ-BUENAHORA admitted to the documents being fake. GONZALEZ-BUENAHORA stated she and her Boyfriend (PEDRAZA-CASTRILLION, Carlos Fernando) bought them for \$120 each from an Unknown friend in Denver, Colorado.
6. On October 6, 2022, GONZALEZ-BUENAHORA was arrested by Border Patrol Agents near San Ysidro, California. GONZALEZ-BUENAHORA was issued a Warrant of Arrest/Notice to Appear and referred to Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) Alternatives to Detention (ATD) program. GONZALEZ-

BUENAHORA failed to attend her scheduled Immigration Court date on March 3, 2023, in Denver, Colorado and was ordered removed in absentia by an Immigration Judge.

7. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.
8. Review of the Alien File (A# XXX XXX 512) for Monica Liliana GONZALEZ-BUENAHORA and queries in U.S. Department of Homeland Security databases confirm no record exists of GONZALEZ-BUENAHORA obtaining permission from the Attorney General or the Secretary of the Department of Homeland Security to be or remain in the United States after her Final Order of Removal from the United States on March 3, 2023.
9. Based on the above information, I believe there is probable cause to conclude that Monica Liliana GONZALEZ-BUENAHORA is a native and citizen of Columbia, who was previously order removed in absentia from the United States and was thereafter found in the United States, without the

express permission from the Attorney General of the United States or from the Secretary of the Department of Homeland Security to be or remain in the United States in violation of Title 8, United States Code, Section 1235(a)(1) and Title 18, United States Code, Section 1028A(A).



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Brett A. Laug, Border Patrol Agent  
U.S. Department of Homeland Security

Subscribed and sworn to before me and signed in my presence and/or by reliable electronic means.



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Honorable Kimberly G. Altman  
United States Magistrate Judge

March 4, 2025